

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TRECIA LORELLE SIBLEY,

Plaintiff,

v.

CHOICE HOTELS INTERNATIONAL,
INC.; RATAN GROUP HOTEL LIMITED
LIABILITY COMPANY d/b/a RODEWAY
INN, RODEWAY INN LONG ISLAND,
RODEWAY INN HUNTINGTON
STATION, and/or HUNTINGTON
COUNTRY INN; XYZ CORPORATIONS 1-
50; MAHESH RATANJI a/k/a
MAHESHCHAND M. RATANJI, KHOZEM
KHARAWALLA, and/or JANE AND JOHN
DOES 1-10, individually and as owner,
officer, director, shareholder, founder,
manager, agent, servant, employee,
representative, and/or independent contractor
of RATAN GROUP HOTEL LIMITED
LIABILITY COMPANY d/b/a RODEWAY
INN, RODEWAY INN LONG ISLAND,
RODEWAY INN HUNTINGTON
STATION, HUNTINGTON COUNTRY
INN, and/or XYZ CORPORATIONS 1-50,

Defendants.

CIVIL ACTION

No. 2:14-cv-00634 (JS) (ARL)

**NOTICE OF MOTION TO VACATE
DEFAULT, PURSUANT TO RULE 55(c)**

To: Brian L. Ponder, Esq.
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PLEASE TAKE NOTICE that on a date to be determined by the court, Patrick W. McGovern, of the law firm Genova Burns Giantomasi Webster LLC, attorneys for defendants, Ratan Group Hotel Limited Liability Company d/b/a Rodeway Inn, Rodeway Inn Long Island, Rodeway Inn Huntington Station, Huntington Country Inn, Mahesh Ratanji a/k/a Maheshchand M. Ratanji, and Khozem Kharawalla (collectively, "Defendants"), will move before the United States District Court for the Eastern District of New York at the Alfonse M. D'Amato Federal Building, 100 Federal Plaza, Central Islip, New York 11722 before the Honorable Judge Joanne Seybert., for an Order vacating default against Defendants, pursuant to Fed. R. Civ. P. 55(c).

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Defendants shall rely on the Brief filed on behalf of Defendants in support of their motion to vacate default and the Affirmation of Patrick W. McGovern, Esq., with Exhibits attached thereto.

GENOVA BURNS GIANTOMASI WEBSTER LLC
Attorneys for defendants, Ratan Group Hotel Limited Liability
Company d/b/a Rodeway Inn, Rodeway Inn Long Island, Rodeway
Inn Huntington Station, Huntington Country Inn, Mahesh Ratanji
a/k/a Maheshchand M. Ratanji, and Khozem Kharawalla

By: s/Patrick W. McGovern
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